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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM,
Plaintiff,
v.
SEAN COMBS a/k/a
“P. Diddy,” “Puff Daddy,” “Love,”
“Puffy” and “Diddy,”
KRISTINA KHORRAM,
SHANE PEARCE,
JOHN DOES 1-3 AND
JANE DOE.

Case No.: 24-cv-07191 (RFL)

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME TO
COMPLY WITH COURT ORDER**

Pursuant to Fed. R. of Civ. Proc. Rule 6(b) Plaintiff respectfully moves this Court to extend the time to comply with the Court's January 14, 2025 Order.¹

Plaintiff has recently discovered new facts that must be alleged and require

1 ECF 15

1 Plaintiff to amend her complaint. Plaintiff has been investigating these facts for
 2 their veracity and has concluded such amending of its complaint is required in the
 3 interest of justice.

4 Additionally, the main Defendant in this litigation, Sean Combs a/k/a
 5 “Diddy”, is currently incarcerated in Brooklyn New York,² where he is awaiting
 6 criminal proceedings against him.³ Due to the rules in New York for serving an
 7 inmate, counsel, as well as other litigants who have litigation against Defendant
 8 Combs, find it difficult to serve Defendant. Counsel has contacted attorneys for
 9 Defendant Combs to discuss waiver but those attorneys never responded to
 10 counsel’s inquiry.⁴ Counsel is sure the attorneys it contacted for Defendant
 11 Combs was the correct attorney because the same attorney filed suit against Ms.
 12 Mitchell on behalf of Defendant Combs.⁵

13 In the interest of fairness and justice, Plaintiff seeks an extension of 30 days in
 14 which to amend and refile its complaint and then subsequently serve the
 15 complaint on the Defendants. This motion is unopposed because no Defendant
 16 has been served and there is no one to oppose Plaintiff’s motion.

17 Plaintiff has not requested an extension of time before and the extension of 30
 18 days will not prevent the litigation from proceeding to a timely resolution as no
 19 Defendants have been served nor will be prejudiced by this brief extension.

20 DATE: February 6, 2025

/s/ Ariel Mitchell

/s/ Shawn Perez

**ARIEL E. MITCHELL, ESQ.
SHAWN PEREZ, ESQ
ATTORNEYS FOR PLAINTIFF**

25 ² MDC Brooklyn, Register Number 37452-054

26 ³ New York Southern District, *United States v. Combs*, 24-cr-542 (AS)

27 ⁴ Exhibit “A”

28 ⁵ Exhibit “B”

DECLARATION

I, Shawn Perez, do declare as follows:

I have personal knowledge of the facts set forth below and if called as a witness to testify, I would and could testify competently thereto.

1. I make this declaration in support of the MOTION TO EXTEND TIME.

2. Currently no Defendant has appeared in this matter or has been served.

3. The statute of limitations may be an issue as the law Plaintiff is using to travel under, California's Sexual Abuse and Cover-Up Accountability Act, ends on December 31, 2026.

I declare under the Penalty of Perjury under the laws of the United States and California that foregoing is true and correct.

February 6, 2025

/s/Shawn Perez, Esq.

Shawn Perez, Esq.

Attorney for Plaintiff